



Funds Management During Incidents

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FUND MANAGEMENT DURING INCIDENTS

The OSC is the key individual responsible for financial management during incidents, whether oil or chemical. Every direction the OSC issues and every resource the OSC calls upon uses funds from the ceiling that has been issued for the incident. The OSC may use existing management tools (e.g., LUFs, CG-5136-F) to help address this responsibility, or the OSC may develop local tools. Commandant (G-CFS) has now mandated that all obligations must be entered in LUFs, including OSLTF and CERCLA obligations. This section defines what must be done, and leaves open to the OSC how the OSC chooses to meet these requirements.

- A) Ceiling Management and Obligation Log. The OSC must always know the current financial status of a response. On large, complex cases, including SONS, the OSC should compare the authorized ceiling against cumulative obligations daily. For other cases, this must be done for each POLREP. The OSC must maintain a running log of obligations issued against the ceiling, and adjust the resulting ceiling balance accordingly. This ensures that the OSC does not commit more funds than are available against the ceiling authorized through CANAPS. An obligation log (also known as a Document Control Number Log) is required by the Coast Guard for financial management of all funds.
- B) Obligation Examples. The OSC must record not only traditional obligations, such as "Contract Authorizations to Proceed" to response contractors; but also TONOs for travel orders; "Pollution Removal Funding Authorizations" to other government agencies; and local procurement for lodging, meeting facilities, utilities, or the rental of equipment needed by the OSC. Finally, the use of Coast Guard personnel, boats, aircraft, cutters, and pollution removal equipment must also be estimated and charged against the ceiling, using standard rates.
- C) Obligations as Estimates. Many obligations result in a liquidated payment or an expenditure that is different from the initial obligation (e.g., travel). The OSC should not delay recording obligations until exact costs are known. An obligation log ensures three things. First, the OSC can track spending decisions while the removal or response is taking place. Second, the OSC has a reference to consult when authorizing further use of the incident ceiling. Finally, there is a record that will support the review and reconciliation of PES data from the Coast Guards Accounting System after actual costs are known.
- D) Recordkeeping. The OSC must use an organized system to track an authorized ceiling, authorize obligations against the ceiling, and to compute the cumulative obligations. Use CG – 5136F or a locally generated ceiling log. As noted above, use LUFs for all standard Coast Guard obligations noted in (B) above.



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- 1) Record in LUFs approved obligated amounts and subsequent changes. Before attempting to enter obligations, ensure that the local LUFs systems manager has set up LUFs using the correct accounting string, FPN/CPN, and Object Codes.
 - 2) Enter contracts, purchase orders, PRFAs, cash purchases, TONOs, etc., in LUFs. Take care to avoid entering unit AFC-30 purchases against the FPN or CPN, or incident purchases against the unit's AFC-30 funds. When more than one LUFs terminal is used on a spill (i.e., MSO and MLC(fcp)) each LUFs location will generate its own DCN log. The OSC financial staff must then collect the data from each log. Using LUFs facilitates keeping a Document Control Number (DCN) log. If LUFs is not used, then the unit must establish and maintain a "purchases" DCN log for the incident.
 - 3) LUFs does not accept non-purchase obligations. Examples of other non-LUFs obligations are civilian overtime costs, medical care under contract personnel, vehicles, boats, cutters, aircraft, or specialized pollution response equipment, physicians for military personnel assigned to the incident, or GSA imposed vehicle charges specifically attributable to the incident paid under preexisting AFC-30 contracts. The OSC must use a local log system to record these obligations as they are incurred. One example is CG-5136F, which is an optional form included in the NPFC Technical Operating Procedures for Resource and Cost Documentation (TOPs). CG-5136F is available in EXCEL for either the Windows or Macintosh operating systems. The OSC may craft a local form that serves the same purpose.
- E) Reporting. When an incident is funded under either the OSLTF/Emergency Fund or CERCLA, the OSC must report in every POLREP the authorized ceiling and the cumulative removal obligations to date for the incident. The NPFC must be included as an Info Addressee on these messages.



USE OF CG RESERVISTS

When Reservists are activated by the OSC, issue the orders using the accounting line for the respective fund and the specific FPN(OSLTF) or CPN(CERCLA). Issue a unique TONO for each reservist.

- I. Use of CG Reservists
 - A) Use PMIS to issue the orders. Orders for reservists include pay, allowances, and travel do not issue separate travel orders to reservists. Contact PPC if PMIS will not accept the accounting data for the incident. If PPC is not able to resolve the issue, bring it to the attention of the NPFC case officer.
 - B) As reservists report in, collect a copy of the orders for personnel management, ceiling management, and subsequent cost documentation.
 - C) The amount paid for individual reservists orders will be reported by DAFIS for each specific TONO issued.

CREDIT CARDS

- II. Use of Credit Cards
 - A. Guidelines for when to use. The Government-wide Purchase card can be a tremendous asset when used in the right situations. The primary reason to consider activating a card is when no other expedient means exists to obtain urgently needed small purchases in support of the FOSC.
 - B. What it can be used for. Generally, the Government-wide Purchase card can be used for anything normally obtained under small purchase rules. It can also be used to rent small equipment, such as a cellular phone, or obtain temporary services, such as a telephone line.
 - C. What it can not be used for. The Government-Wide Purchase card can NOT be used for travel, lodging or meals.
 - D. How to obtain/activate
 1. Existing card
 - a. An existing Government-wide Purchase card can be converted to use for FPN specific use if it has been unused since the last monthly statement was received. Once converted, the card cannot be re-converted to another accounting string for at least 1 billing statement period of no activity.
 - b. First, determine and verify the accounting string for the FPN.



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- c. Send the requested accounting line change to FINCEN by E-mail to:
PurchaseCard@fincen.uscg.mil.
 - d. The E-mail must include: card number; cardholder name; old line of accounting; new line of accounting; name and phone number of point of contact. NOTE: The FINCEN point of contact is: FINCEN OPQ (757) 523-6777.
 - e. This procedure is in effect 24 hours a day, 7 days a week.
2. New card
- a. Only order a new card if an existing card is not available for conversion.
 - b. First, determine and verify the accounting string for the FPN.
 - c. Call the Purchase Card Administrator in the District Office and ask them to process an emergency issuance request with Bank of America Be sure you specify that you need an "Emergency Card".
 - d. Generally, an emergency card will be Federal Expressed by The Bank of America and in hand within 48 to 72 hours, maximum.
 - e. You can speed up the process if you can complete the information required in the application instruction pamphlet. If you don't already have one, call your District Card Administrator to obtain a copy for future reference and keep it in the safe with your units Purchase cards.
 - f. This procedure is only available during District business hours, unless other alternatives are developed between you and the District Purchase Card Administrator.
- E. Documentation. All documentation procedures currently in effect for normal Government-Wide Purchase Card orders purchases apply to cards converted to FPN specific use. A current log of all purchases must be maintained listing the date, vendor, item/service, amount, and whether or not the order was placed by



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telephone (no sales slip). Brown sheets are highly encouraged.

- F. Statements and payments. Statements from Bank of America will be received in the normal manner and time cycle. Standard certification, documentation and payment practices will be adhered to. Copies of all certified statements and supporting documentation will be made before forwarding to FINCEN for payment and included in the FOSCs documentation package for later forwarding to NPFC Case Management.